

Native Vegetation Regulation  
Department of Water and Environmental Regulation (DWER)  
Locked Bag 10  
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[info@dwer.wa.gov.au](mailto:info@dwer.wa.gov.au)

Dear DWER Officers,

**SUBMISSION ON: CLEARING PERMIT APPLICATION**

**CPS 10205/1:** Area permit application by Department of Primary Industries & Regional Development

**Locality:** Lot 6307 on Deposited Plan 39948, Myalup (Shire of Harvey)

**Clearing:** 1 ha within a 9.11 ha footprint

**Clearing Purpose:** Construction and operation of a Managed Aquifer Recharge (MAR) pilot

The Urban Bushland Council WA Inc. (UBC) presents this submission in response to your invitation to address issues of relevance to us.

**Urban Bushland Council WA Inc. (UBC)**

The UBC is the peak WA community organisation for urban bushland recognition and protection. UBC is an incorporated, not for profit organisation registered as a charity.

<https://www.bushlandperth.org.au/>. We are a voluntary community association with an active membership of **88 volunteer groups** (each with their own local membership from 10-165 individuals) and an additional 100 individual 'supporter' members – all with a common interest in conservation and protection of areas of urban bushland in WA.

We are the key community organisation in WA providing a public voice on **the need for retention of what remains of our urban bushland and wetlands which is also critical for a healthy and prosperous future**. We advocate to all levels of Government for natural areas protection. We do this with limited resources through the amazing efforts of our 'Friends Groups' and their many volunteers – from all walks of life 'working' to improve and maintain the health of patches of neighbourhood nature – many working in close collaboration with your department and their local council.

UBC makes this submission because this is clearly a forerunner activity for later proposals that will see extensive clearing of native vegetation and the conversion of land use to intensive agriculture. We request that the Department of Primary Industries and Regional Development (DPIRD) Clearing Application be withdrawn.

**General comments and submission**

UBC alerts DWER about the apparent confusion of the area proposed for clearing and the related impacts:

- 1 ha and 9.1 ha are both stated (although the summary states 1 ha)

- The future plan indicates the clearing of 2,051 ha for intensive irrigated agriculture (but not included in this application). This subsequent plan is a major and significant proposal on which the MAR pilot data is dependent.

In addition, the data provided through DWER's advertisement, contains various uncertainties.

- Is the application for clearing 1 ha or for 9.11 ha?
- Is the application for clearing regrowth native vegetation or a mix of regrowth native vegetation and original native vegetation?
- As all the 'scrub' is proposed for clearing, the following statement can hardly apply: 'To minimise the project's impact the advice is: *'Ensure that due care is taken to avoid impacting the regrowth native vegetation on site during the construction, operation and decommissioning of the project'* (page 8, dot-point 2)

UBC opposes this Application for a Clearing Permit for the following reasons.

- 1.) The proposed clearing is part of a staged proposal.  
The subsequent proposal is for the clearing of 2,051 hectares of forest and remnant vegetation within the approximate 6,378 ha project area for irrigated, intensive agriculture. This is not included in the application.
- 2.) Whilst the proposed clearing is stated to be for 1ha of 'scrub', it is also stated that: *'DPIRD seeks authorisation to clear all regrowth native vegetation shrubs from within the 9.11 ha basin site (n.b.616 shrubs) in case additional clearing is ultimately required for the project.'* (p 9, Application for new permit...)  
Perhaps this application is made too soon if the proposed MAR pilot is yet to have a plan. As well, the subsequent proposal is *'(subject to the resolution of several government processes, which are yet to formally commence)'* (page 7, 5.3 Application for new permit).
- 3.) More information is required about the Managed Aquifer Recharge (MAR) pilot – the subject of this Clearing Permit application. For example:
  - a. What would be the quality of the water being recharged?
  - b. Where would the water be sourced from?
  - c. Would water investment 'stack up' environmentally?
  - d. Could the MAR pilot data be obtained theoretically through modelling?
  - e. Would the proposal affect more shallow rooted native plants? Potential indirect impacts include the 'alteration of the local hydrology resulting from the permanent removal of pine plantations which may affect nearby groundwater dependent ecosystems (p3 Ecoscape Flora Report...)
- 4.) Climate change and water availability.  
*'Climate modelling predicts that mean annual runoff in the Harvey to Preston region will reduce by between 7 and 40% in 2030 compared to the period 1975-2007 (scenarios C-wet and C-dry respectively, CSIRO 2009)'. <https://rivers.dwer.wa.gov.au/basin/harvey-river/>.*
  - a. Is irrigated agriculture sustainable in a drying climate with water scarcity?
- 5.) Matters of National Environmental Significance (MNES)  
UBC understands that the forest supports four species of MNES:
  - a. Three Black Cockatoos (Forest Red-tailed, Carnabys, Baudin's) foraging and potential roosting. Thus, the regrowth trees have significance. This is also a black cockatoo count site.

b. Western Ringtail Possum (Critically Endangered).

6.) Further fauna investigation.

The proponent has not provided a targeted site, fauna survey, for evidence of onsite fauna, foraging, roosting and/or nesting. This is required to ensure 'Avoidance' with no direct/indirect fauna impact – ie a fauna survey is required.

7.) Loss of all *Macrozamia riedlei* (*Zamia*).

The antiquity of the genus should be a consideration in this proposal. For example, the genus was growing around 250 million years ago. The sharply pointed fronds of this ancient genus protected the plant from grazing dinosaurs (Botanic Gardens and Parks Authority 'Plants in Focus').

During the 1980s and 90s a reassessment of the pollination of cycads was made. The production of heat and odours was shown to be widespread in cycad cones (Tang, W (1987). *Insect pollination in the cycad Zamia pumila (Zamiaceae)*. Amer. J. Bot. 74: 90– 99;

Terry LI, Gimme H, Walter JS, Donaldson E, Snow P, Forster PI & PJ Machin (2005) *Pollination of Australian Macrozamia Cycads (Zamiaceae): Effectiveness and Behavior of Specialist Vectors in a Dependent Mutualism* American Journal of Botany Vol. 92, No. 6 (Jun., 2005), pp. 931-940

Prior to the 1980s and 90s, it was thought that macrozamia plants were wind pollinated. It is now known that macrozamia plants are pollinated by Tranes weevils, that are attracted from the male plants to the female plants, thus facilitating fertilization.

It is suggested that respect for these plants might be shown, rather than them being considered part of the 'scrub'.

In addition, the UBC understands that there are still Emus in the area and macrozamia seeds are an important part of the diet of emus as well as other animals.

## Conclusion

This proposed clearing application is confused and as stated, is part of a significant staged proposal that is not included in this clearing application.

The UBC recommends that the proposal be withdrawn.

Yours sincerely

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Chairperson  
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